John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 17, 2013

Mr. Owen Thompson
Remedial Project Manager
Superfund Division
U.S. EPA Region 5, SR-J6
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Fields Brook Superfund Site, Detrex Source Control Operable Unit (OU-5), Explanation of Significant Differences (ESD), Ohio EPA ID # 204-000300-009

Dear Mr. Thompson:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the Draft Explanation of Significant Differences (ESD) for the Fields Brook Superfund Site, Detrex Corporation Source Area (OU-5) and our comments are included below.

As you know, Ohio EPA does not concur with the Fields Brook Record of Decision (ROD) and for several years the Agency has refrained from providing technical comments on Site documents and decisions. Ohio EPA has remained engaged in Site activities in a support role. This letter does not represent a change in our position nor does it represent an explicit or implicit approval of this ESD or the ROD (issued on September 27, 1997).

Comments

1. Ohio EPA agrees that the vacuum enhanced DNAPL extraction wells installed at Detrex have not worked as well as expected, despite efforts over several years to improve the system. The Agency also agrees that a passive extraction well system, combined with the existing partial slurry wall and the ground water interceptor trench, may produce better results.

2. Ohio EPA agrees that the monitoring data have not shown evidence of DNAPL migration through the subsurface soil or ground water, except within the source area. DNAPL does not appear to be actively migrating from the source area to Fields Brook.

3. During the period of time since the active extraction has been in place a persistent problem has been that the wells become plugged and less effective over time. The problem was exacerbated by the active vacuum system, but how does U.S. EPA propose to ensure that this does not also occur with the passive extraction system?

4. Ohio EPA agrees with the goal that the entire source area achieve a residual (non-mobile) concentration of DNAPL in soil. There is a concern though that when the target levels proposed in the ESD are eventually met and the collection wells are abandoned, there will be no way to determine whether the residual concentration is maintained within the source area. Given the difficulty of locating, measuring and monitoring DNAPL in the subsurface soil, the Agency would like to see some mechanism left in place to monitor over the longer term. How does U.S. EPA propose to ensure the longer term protectiveness of this remedy?

Please feel free to call me at (330)963-1210, should you have any questions or concerns about this letter.

Sincerely,

Regan S. Williams
Division of Environmental Response and Revitalization

RW/nvr

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